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August 25, 1998

Mr. Lester Snow
Program Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow:

Subject: Comments on the CALFED Draft Staging and Implementation Plan

Alameda County Water District (ACWD) is pleased to have the opportunity to comment on the August 5, 1998 draft working paper entitled, "Developing a Draft Preferred Program Alternative" for the CALFED Bay-Delta Program.

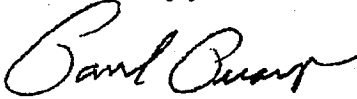
We agree with CALFED's proposed staged implementation of the preferred alternative contained in the draft document. We strongly support continued planning for all facilities in all three alternatives after the completion of the programmatic EIR/EIS. This is especially important due to the long lead time required for detailed planning, permits, cost estimating, land acquisition, and construction of facilities. This course of action will help to minimize any delay between the implementation of new drinking water standards and the ultimate Bay-Delta water supply solution. If during the Stage 1 program, any one of the alternatives has proven to meet the objectives, then aspects of the other alternatives could be eliminated at that time. To not proceed now with the planning for all proposed facilities could force drinking water utilities to implement unnecessarily expensive treatment technologies (that are not yet technically or economically proven on a large scale) solely because of a delay in the implementation of potentially necessary facilities.

However, we do not support the concept of "linking" implementation of surface water storage facilities (or any other CALFED program and/or facility) to a certain "target" level of water conservation implementation by urban and/or agricultural agencies. As currently proposed, agencies who comply with the CALFED conservation requirements (and who are also subject to a new regulatory framework complete with fines and other penalties) are not guaranteed to receive corresponding water supply benefits through additional CALFED storage facilities. For instance, if a certain number of agencies are not in compliance (and CALFED storage is not built), then agencies who do comply would be penalized by the inaction of others. As an alternative approach, the water supply benefits of CALFED water programs should only be extended to those agencies which comply with the conservation requirements (as is currently stated in the CALFED Water Use Efficiency Program). This alternative approach would allow those agencies who demonstrate that they are acting in good faith to receive water supply benefits, and discourage noncompliance by not allowing benefits to agencies who are not in compliance.

Mr. Lester Snow
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Thank you for the opportunity to comment on this draft of the CALFED Implementation and Staging Plan. We look forward to receiving future versions of this important planning document.

Very truly yours,



Paul Piraino
General Manager

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